



Sony Electronics Inc.

1667 K Street, NW, Suite 825, Washington, DC 20006 Telephone: (202) 429-3651

November 14, 2016

VIA ECFS

Brian Regan
Associate Bureau Chief
Wireless Telecommunications Bureau
Federal Communications Commission
441 12th Street, SW
Washington, DC 20006

RE: Proposal of Sony for Certification as a SAS Administrator
Second Request for Supplemental Information
GN Docket 15-319

Mr. Regan:

Sony Corporation (“Sony”) submits the following response to the Commission’s second Request for Supplemental Information, dated November 7, 2016, regarding Sony’s request for conditional approval to operate as a Spectrum Access System (“SAS”) Administrator in the 3550-3700 MHz Band. Sony consents to the sharing of this response with other Federal government agencies.

Please contact the undersigned with any questions about this submission.

Respectfully submitted,

_____/s/_____
James Morgan
Director and Counsel
Sony Electronics Inc.
james.morgan@am.sony.com
202-429-3651

cc: (via email)
Becky Schwartz
Paul Powell
Ira Keltz
Amanda Huetinck

1. On page 9 of its SAS application, as well pages 4 and 9 of its supplemental filing, filed September 26, 2016, regarding how Sony will respond to FCC enforcement requests, as well as how it will respond to reports of interference and requests for additional protection from Incumbent users, Sony describes “a password-protected web application that will enable the Commission and Incumbent access users to have direct access to the data in the Sony SAS without requiring any additional involvement by Sony” and states that “the Sony SAS will allow the Commission [sic] deactivate or restrict interfering CBSDs as necessary.” **Please elaborate on how you expect this database to work in practice, e.g., does Sony plan to take any affirmative steps of its own to address interference reports from Incumbent Access users, what level of communication will the SAS have with Incumbent Access users [and other federal agencies], and exactly how do you foresee this database being used to address those interference reports from Incumbent Access users? (§§ 96.53(o); 96.63(m))**

The password-protected web application described in the Sony SAS application and supplemental filing is designed to serve as an interference report intake system. The purpose of the web application is to give the Commission and Incumbent Access users a direct, expedited mechanism for deactivating or restricting an interfering CBSD that does not require involvement by Sony. In practice, the Commission or an Incumbent Access user would access the Sony SAS web application, would input the geolocation, frequency, and time information necessary to identify the source of the interference, and would receive an anonymized list of relevant CBSDs in response. The application would then allow the Commission or Incumbent Access user to deactivate or restrict the operations of those CBSDs deemed to be causing interference.

Alternatively, the Commission or an Incumbent Access user might wish to deliver an interference report to the Sony personnel overseeing operation of the Sony SAS, rather than to deactivate or restrict the interfering operations by itself. In this case, the Commission or the affected incumbent would simply send the interference report to a pre-designated email address, and Sony personnel would deactivate or restrict CBSD operations using the same web application described above.

In addition, the Wireless Innovation Forum is currently considering whether to develop and standardize procedures for interference reporting. Sony is participating in these discussions, and will implement any standards or procedures that result.

2. On page 9 of its SAS application, as well pages 2, 6, and 10 of its supplemental filing, Sony states that it will obtain geolocation information for Protection Zones from a NTIA Federal Incumbent database (ntia.doc.gov/category/3550-3650-mhz). The NTIA “database” you reference does not contain Protection Zone information, only static exclusion zone information. **Please affirm your understanding of this and adjust your previous statements accordingly to reference the fact that you intend to obtain the Protection zones from the referenced website (i.e. not from a database). (§ 96.53(e))**

Sony understands that the NTIA website referenced in Section 96.15(a)(3) of the Commission’s rules (ntia.doc.gov/category/3550-3650-mhz) contains only static Exclusion Zone information and is not, in fact, a database. The Sony SAS shall maintain and enforce Exclusion Zones based on the information obtained from this NTIA website until one or more ESCs are approved and used by at least one SAS.

If an approved ESC begins providing sensing information for a given Exclusion Zone or portion of an Exclusion Zone, the Sony SAS will convert that geographic area into a Protection Zone, and will specify appropriate operating parameters for CBSDs operating within it based on the ESC data that it receives.

If, however, an ESC has not been approved to provide sensing information for a given Exclusion Zone or portion of an Exclusion Zone, the Sony SAS will continue to treat that geographic area as an Exclusion Zone, and will not authorize CBSD operations within it.